

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2012

Docket No. N2012-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO QUESTION 3
OF PRESIDING OFFICER'S INFORMATION REQUEST NO. 9
(June 14, 2012)**

The United States Postal Service hereby files the response of Postal Service witness Martin (USPS-T-6) to question 3 of Presiding Officer's Information Request No. 9, dated May 31, 2012.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Pricing and Product Support

Matthew J. Connolly
Attorney

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1137
(202) 268-8582; Fax -5418
matthew.j.connolly@usps.gov

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN TO
QUESTION 3 OF PRESIDING OFFICER'S INFORMATION REQUEST NO. 9**

3. Please refer to Library Reference USPS-LR-N2012-1/77, Excel file 'rev_Plant_to_Post_Office_Update_(4.16.12).xls' tab 'Actual.' All highway routes reported in all of the February 23, 2012 AMP studies were used to obtain a 3.18 percent reduction in plant-to-post office operating miles. The routes included in the calculation consist of all types of highway contracts: Intra P&DC, Inter CSD, Inter Cluster, Inter Area, Inter NDC, Intra NDC, and Plant Load transportation. Please explain the rationale for using all types of transportation in the calculation, instead of using only plant-to-post office transportation contracts.

RESPONSE:

My estimate of the reduction in plant-to-Post Office operating miles attributable to network rationalization was based on the transportation worksheets included in the February 23, 2012 AMP studies. Although these transportation worksheets primarily include plant-to-post office routes (i.e., intra-P&DC routes), local offices sometimes include routes that fall into other transportation categories. There was no reason for including these routes in the plant-to-Post Office analysis other than the fact that these routes were shown on the transportation worksheets for each AMP. Please be advised, however, that I ensured that no route that was listed in an AMP study was also included in the Plant-to-Plant spreadsheet that formed the basis for my estimate of the reduction in plant-to-plant trips attributable to network rationalization. Therefore, I believe that the two estimates, when considered together, provide a reasonable estimate of the reduction in transportation activity attributable to network rationalization.